

**OUTTEN & GOLDEN LLP**

Moira Heiges-Goepfert (Cal. Bar No. 326861)  
One California Street, 12th Floor  
San Francisco, CA 94111  
Telephone: (415) 991-8514  
Facsimile: (415) 638-8810  
mhg@outtengolden.com

Sophia L. Hall (*pro hac vice*)

**LAWYERS FOR CIVIL RIGHTS**

61 Batterymarch Street, 5th Floor  
Boston, MA 02110  
Telephone: (617) 482-1145  
Facsimile: (617) 482-4392  
shall@lawyersforcivilrights.org

**McGUIREWOODS LLP**

Anthony Q. Le (SBN 300660)  
Two Embarcadero Center, Suite 1300  
San Francisco, CA 94111-3821  
Telephone: 415.844.9944  
Facsimile: 415.844.9922

K. Issac deVyver (*pro hac vice*)

Karla Johnson (*pro hac vice*)

Tower Two-Sixty  
260 Forbes Avenue, Suite 1800  
Pittsburgh, PA 15222  
Telephone: 412.667.6000  
Facsimile: 412.667.6050

*Attorneys for Defendants*

*Attorneys for Plaintiffs and the Proposed Class  
(Additional Counsel Listed on Signature Page)*

*Social Finance, Inc. d/b/a SoFi and  
SoFi Lending Corp. d/b/a SoFi*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

RUBEN, CALIN CONSTANTIN  
SEGARCEANU, EMILIANO GALICIA, and  
JOSUE JIMENEZ, on behalf of themselves  
and all others similarly situated,

Plaintiffs,

vs.

SOCIAL FINANCE, INC. d/b/a SOFI, and  
SOFI LENDING CORP. d/b/a SOFI,

Defendants.

Case No.: 4:20-cv-03386-HSG

**JOINT STIPULATION AND ORDER TO  
FURTHER STAY LITIGATION**

District Judge: Haywood S. Gilliam, Jr.  
Complaint filed: May 19, 2020  
First Amended Complaint Filed: July 30, 2020  
Second Amended Complaint Filed: May 3,  
2021

Pursuant to Civil Local Rules 6-1(b) and 6-2, Plaintiffs Ruben Juarez, Calin Constantin Segarceanu, Emiliano Galicia, and Josue Jimenez ("Plaintiffs"), through counsel, along with counsel for Defendants Social Finance, Inc. d/b/a SoFi and SoFi Lending Corp. d/b/a SoFi

(collectively, “SoFi,” and together with Plaintiffs, the “Parties”), respectfully submit the following Joint Stipulation and Proposed Order to Further Stay Litigation.

**RECITALS**

WHEREAS, on May 19, 2020, Plaintiff Juarez filed a putative class action Complaint against SoFi in the above-captioned matter, asserting violations of the Civil Rights Act of 1866, 42 U.S.C. § 1981, and the California Unruh Civil Rights Act, Cal. Civil Code §§ 51, *et seq.*, (D.E. 1);

WHEREAS, on July 30, 2020, Plaintiffs Juarez and Segarceanu filed a First Amended Complaint, adding named Plaintiff Segarceanu and claims under the Fair Credit Reporting Act, 15 U.S.C. § 1681, *et seq.* (D.E. 33);

WHEREAS, on May 3, 2021, Plaintiffs filed a Second Amended Complaint (as authorized by the Court), incorporating additional named Plaintiffs Jimenez and Galicia (D.E. 56, 62);

WHEREAS, following the May 4, 2021 case management conference, the Court entered a Scheduling Order on May 12, 2021, pursuant to which fact discovery closes April 3, 2022 (D.E. 66);

WHEREAS, on July 15, 2021, the Parties participated in a private mediation session with JAMS arbitrator David Geronemus, Esq., during which they were ultimately unable to reach a settlement;

WHEREAS, on November 3, 2021, the Court approved the Parties’ Joint Stipulation seeking to stay the case through December 28, 2021 in order to focus on continued settlement discussions, but cautioned the Parties that if the case is not settled by December 28, 2021, they should be prepared to proceed under the current case schedule (D.E. 84);

WHEREAS, since that time, the Parties have continued to discuss settlement and have made substantial progress, and are in the process of attempting to finalize and document a settlement;

WHEREAS, a continued stay will further conserve judicial resources and allow the parties to continue efforts towards settlement; and

WHEREAS, the Parties affirm that no party will be prejudiced by this stipulation, nor will the requested extension unduly delay the case;

**STIPULATION**

THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiffs and SoFi through their respective undersigned counsel that:

1. All formal discovery, discovery obligations and motion practice shall be suspended and stayed for another 30 days, (until January 27, 2022) to enable the Parties to conserve resources and focus their efforts on settlement;
2. The Parties will submit an update to the Court on or before January 27, 2022 in which they will apprise the Court of the status of their settlement efforts;
3. This stipulation is without prejudice to the rights, claims, arguments, and defenses of all Parties; and
4. All other signatories listed, and on whose behalf the filing is submitted, concur with the content in this Stipulation and have authorized the filing.

IT IS SO STIPULATED.

OUTTEN & GOLDEN LLP

MCGUIRE WOODS LLP

Dated: December 28, 2021

Dated: December 28, 2021

By: /s/ Ossai Miazad  
Ossai Miazad (*pro hac vice*)  
685 Third Avenue, 25th Floor  
New York, NY 10017  
Telephone: (212) 245-1000  
Facsimile: (646) 509-2060  
om@outtengolden.com

By: /s/Anthony Q. Le  
K. Issac deVyver (*pro hac vice*)  
Karla Johnson (*pro hac vice*)  
Tower Two-Sixty  
260 Forbes Avenue  
Suite 1800  
Pittsburgh, PA 15222  
Telephone: 412.667.6000  
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Facsimile: (415) 638-8810  
mhg@outtengolden.com

Anthony Q. Le (SBN 300660)  
Two Embarcadero Center  
Suite 1300  
San Francisco, CA 94111-3821  
Telephone: 415.844.9944  
Facsimile: 415.844.9922

Mikael Rojas (Cal. Bar No. 309626)  
OUTTEN & GOLDEN LLP  
601 Massachusetts Avenue NW, Suite 200W  
Washington, D.C. 20001  
Telephone: (202) 847-4400  
Facsimile: (646) 509-2008  
mrojas@outtengolden.com

*Attorneys for Defendants*  
*Social Finance, Inc. d/b/a SoFi and*  
*SoFi Lending Corp. d/b/a SoFi*

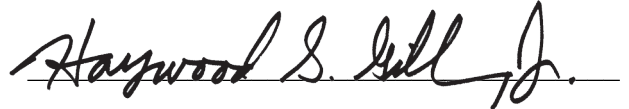
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*Attorneys for Plaintiffs Ruben Juarez, Calin*  
*Constantin Segarceanu, Emiliano Galicia,*  
*Josue Jimenez and the Proposed Class*

**ORDER**

**PURSUANT TO STIPULATION, IT IS SO ORDERED,**

DATED: January 3, 2022

A handwritten signature in black ink, reading "Haywood S. Gilliam, Jr.", written over a horizontal line.

Haywood S. Gilliam, Jr  
United States District Judge

**ATTESTATION**

In compliance with Civil Local Rule 5-1(i)(3), regarding signatures, I hereby attest that I have obtained the concurrence in the filing of this document from all signatories.

Dated: December 28, 2021

/s/ Anthony Q. Le  
Anthony Q. Le